

**FILED**

FEB 29 2024

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

DALE PINCHOT,

Defendant.

## INFORMATION

CASE NO

Title 26, United States Code,  
Section 7201

JUDGE CARR

COUNT 1

(Tax Evasion, 26 U.S.C. § 7201)

The United States Attorney charges:

1. During the calendar year 2014, Defendant DALE PINCHOT received taxable income upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make an income tax return on or before April 15, 2015, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, PINCHOT, from on or about January 1, 2014, through on or about December 31, 2014, in the Northern District of Ohio, Western Division and elsewhere, willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar year 2014, by committing the following affirmative acts, among others:

a. using offshore bank accounts in nominee names to conceal the receipt, ownership, and control of taxable income, including the repatriation of that income to the Northern District of Ohio, Western Division;

- b. using a call center located in the Northern District of Ohio to direct investors to fund their binary options accounts via overseas credit card processors or wire transfers to overseas bank accounts controlled by PINCHOT and/or his partner, Jared J. Davis;
- c. failure to maintain business records reflecting distribution of profits; and
- d. preparing a false IRS Form W-8BEN-E declaring that the revenue of Welsh Investments Global, Limited was not related to a trade or business in the United States.

All in violation of Title 26, United States Code, Section 7201.

COUNT 2  
(Tax Evasion, 26 U.S.C. § 7201)

The United States Attorney further charges:

2. During the calendar year 2015, Defendant DALE PINCHOT received taxable income upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make an income tax return on or before April 18, 2016, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, PINCHOT, from on or about January 1, 2015 through on or about December 31, 2015, in the Northern District of Ohio, Western Division and elsewhere, willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar year 2015, by committing the following affirmative acts, among others:

- a. using offshore bank accounts in nominee names to conceal the receipt, ownership, and control of taxable income, including the repatriation of that income to the Northern District of Ohio, Western Division;
- b. using a call center located in the Northern District of Ohio to direct investors to fund their binary options accounts via overseas credit card processors or wire

transfers to overseas bank accounts controlled by PINCHOT and/or his partner, Jared J. Davis; and

c. failure to maintain business records reflecting distribution of profits.

All in violation of Title 26, United States Code, Section 7201.

COUNT 3  
(Tax Evasion, 26 U.S.C. § 7201)

The United States Attorney further charges:

3. During the calendar year 2016, Defendant DALE PINCHOT received taxable income upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make an income tax return on or before April 18, 2017, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, PINCHOT, from on or about January 1, 2016 through on or about December 31, 2016, in the Northern District of Ohio, Western Division and elsewhere, willfully attempted to evade and defeat income tax due and owing by him to the United States of America, for the calendar year 2016, by committing the following affirmative acts, among others:

- a. using offshore bank accounts in nominee names to conceal the receipt, ownership, and control of taxable income, including the repatriation of that income to the Northern District of Ohio, Western Division;
- b. using a call center located in the Northern District of Ohio to direct investors to fund their binary options accounts via overseas credit card processors or wire transfers to overseas bank accounts controlled by PINCHOT and/or his partner, Jared J. Davis; and